

NICOLAS V. VIETH

Bar Nos. ID 8166 / WA 34196

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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

MAR 06 2018

SEAN F. McAVOY, CLERK
DEPUTY
RICHLAND, WASHINGTON

Attorney for Defendant - Jese David Carillo Casillas

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON
(The Honorable Edward F. Shea)**

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

JESE DAVID CARILLO CASILLAS,)

Defendant.)

CASE NO. 4:15-CR-06049-EFS-2

**DEFENDANT'S STATEMENT OF
REASONS IN SUPPORT OF THE
MOTION TO CONTINUE TRIAL**

My attorney has advised me of my rights under the Speedy Trial Act, 18 U.S.C. § 3161, to go to trial within a seventy-day period. My attorney has also advised me that a continuance of the trial is needed, and we discussed the reasons for a continuance.

A motion to continue the trial has been filed.


Defendant's Statement of Reasons in Support of Motion to Continue Trial - 1

1 My attorney has advised me, and I understand that, if the Court grants the
2 motion to continue that all time between the date the motion to continue is filed
3 and the new date for trial will be excluded from the speedy-trial period under the
4 Speedy Trial Act.

5 After reviewing the motion and discussing the reasons for the requested
6 continuance with my attorney, I knowingly and voluntarily ask this Court to
7 grant that motion to continue and reset the trial date from its current date of
8 March 26, 2018, to a date not later than 10/10/2018, for the
9 following reasons as found in 18 § U.S.C. 3161: (1) Defense counsel was only
10 recently appointed on February 14, 2018, and needs additional time to review the
11 record and discovery; (2) Defense counsel needs additional time to retain
12 experts; (3) Defense counsel requires the use of a Spanish-English interpreter to
13 communicate with the Defendant; and (4) Discovery was received by Defense
14 counsel on February 22, 2018, and appears to be rather voluminous.

15 I declare under penalty of perjury that the foregoing is true and correct.

16
17 Jesé D Casillas c.
JESE CARILLO CASSILAS
18 DEFENDANT
Date: March 06, 2018



NICOLAS V. VIETH
COUNSEL FOR DEFENDANT
Date: March 06, 2018

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 6th day of March, 2018, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system which sent a Notice of Electronic Filing to the following person(s):

USAWAE.CBaunsgardECF@usdoj.gov
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/s/ Nicolas V. Vieth
NICOLAS V. VIETH